

# **EXHIBIT A**

Declaration of Kim Cargor

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

SCOTT SEDORE,

NO. 2:22-cv-10060

Plaintiff,

v

HON. GERSHWIN A. DRAIN

SIRENNA LANDFAIR, *et al.*,

Defendants.

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**DECLARATION OF KIM CARGOR**

I, Kim Cargor, say as follows:

1. If sworn as a witness, I can testify with personal knowledge to the facts contained within this declaration.
2. I am employed as the Warden at G. Robert Cotton Correctional Facility (JCF). I was not employed at JCF in any capacity in June 2021.
3. I am currently on FMLA leave for medical reasons.
4. On the evening of Saturday March 15, 2025, I was presented with a subpoena at my residence (attached). The subpoena states that I must appear in court for the above captioned case on March 19, 2025.

5. I have several medical appointments the week of March 17-21, that I must attend, both for myself and for my husband, including on March 19, 2025.
6. I declare under penalty of perjury that the foregoing is true and correct.

DECLARANT SAYS NOTHING FURTHER.

Executed on March 16, 2025 Kim Cargon

Kim Cargon 3/16/25

**UNITED STATES DISTRICT COURT**  
for the  
**Eastern District of Michigan**

Scott Sedore, #210661 <i>Plaintiff</i> v. Sireenna Landfair, et al., <i>Defendant</i>	) ) ) ) ) Civil Action No. 2:22-CV-10060
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**SUBPOENA TO APPEAR AND TESTIFY  
AT A HEARING OR TRIAL IN A CIVIL ACTION**

To: Warden Kim Cargon

*(Name of person to whom this subpoena is directed)*

**YOU ARE COMMANDED** to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: Theodore Levin U.S. Courthouse 231 W. Lafayette Blvd., Room 751 Detroit, MI 48226	Courtroom No.: 761 Date and Time: 03/19/2025 8:30 am
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You must also bring with you the following documents, electronically stored information, or objects (*leave blank if not applicable*):

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 03/14/2025

*CLERK OF COURT*

*Signature of Clerk or Deputy Clerk*

OR

*Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) Scott Sedore  
Joshua S. Goodrich, J.D., LL.M., who issues or requests this subpoena, are:

5208 W Saginaw, Hwy 81142, Lansing, MI 48917, 269-312-7435, jsgoodrich@lighthouse-litigation.com

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).